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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

vs.

HANNAM CORPORATION, a Commonwealth of  
the Northern Mariana Islands corporation,

Defendant.

CASE NO. CV 07-0035

PLAINTIFF'S  
INITIAL DISCLOSURES

COMES NOW, Plaintiff ZHAI LAN JIANG, by and through her attorney, pursuant to Fed.  
R. Civ. P. 26(a)(1) and LR 16.2CJ(d), with the following disclosures:<sup>1</sup>

**A. PERSONS LIKELY TO HAVE DISCOVERABLE INFORMATION**

The following individuals and entities are likely to have discoverable information that Plaintiff  
may use to support her claims in this case:

1. Plaintiff who may be contacted through her attorney of record at the address and  
phone numbers above listed;
2. Defendant;
3. Jun Soo Park who may be contacted through Defendant;

<sup>1</sup> A copy of Plaintiff's Initial Disclosures has been filed with the Court. See L.R. 16.2CJ.d.

4. Mrs. Park who may be contacted through Defendant;
5. Past employees of Defendant who became pregnant while employed by Defendant to be identified through discovery;
6. Ms. Song who may be contacted through Defendant;
7. Several other past and present employees and or associates of Defendant and its business, may have information Plaintiff may use to support her claims in this case.

Pursuant to Fed. R. Civ. P. 26(e), Plaintiff reserves the right to amend and supplement this list if additional information becomes available during the course of discovery.

**B. LISTING, DESCRIPTION AND LOCATION OF DOCUMENTS, DATA COMPILATIONS AND TANGIBLE THINGS**

1. The EEOC Case File for Charge Number 378-2005-00262 (Bates Numbers 00001-00114);
2. Letter from Stephen J. Nutting dated September 28, 2006;
3. Copies of identification documents for Plaintiff;
4. Copy of EEOC Questionnaire completed by or on behalf of Plaintiff;
5. Copy of Charge of Discrimination in Charge No. 378-2005-00262;
6. Letter from EEOC to Plaintiff dated March 17, 2006;
7. Authorization to Seek Temporary Employer issued to Plaintiff;
8. Nonresident Worker contract documents for Plaintiff;
9. Letter from EEOC to CNMI Department of Labor dated March 24, 2005;
10. Letter from Plaintiff to EEOC dated March 23, 2005;
11. Letter from CHC to Han Nam Market dated November 24, 2004;
12. Various CHC billing records for Plaintiff;
13. Letter from CHC to Han Nam Market dated August 5, 2004.

Pursuant to Fed. R. Civ. P. 26(e), Plaintiff reserve the right to amend and supplement this list if additional information becomes available during the course of discovery.

1 **C. COMPUTATION OF DAMAGES**

2 Damages in this matter will depend, *inter alia*, upon the number of employees of Defendant,  
3 the period of unemployment by Plaintiff, and various intangible elements all of which will be  
4 discovered prior to trial and/or determined at trial. It is not possible to provide any computation of  
5 damages at this stage of the litigation.

6 **D. LIABILITY INSURANCE AGREEMENT**

7 Defendant may have, or may have had, various policies of insurance that would cover the  
8 claim advanced by Plaintiff in this matter. However, the existence and terms of such policy or  
9 policies are unknown to Plaintiff and, therefore, need to be identified and produced by Defendant  
10 in its initial disclosures.

11 **E. CERTIFICATION**

12 Pursuant to Fed. R. Civ. P. 26(g)(1), I hereby certify that to the best of my knowledge,  
13 information, and belief, formed after reasonable inquiry, that the above disclosure is complete and  
14 correct as of the date set forth below.

15  
16 DATED this 2<sup>nd</sup> day of January, 2008.

17 /s/ Mark B. Hanson

18 MARK B. HANSON

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24 Attorney for Plaintiff  
25  
26  
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CERTIFICATE OF SERVICE

I certify that the following were served with a copy of the foregoing via the Court's Case Management/Electronic Case Filing system (CM/ECF):

STEPHEN J. NUTTING, ESQ.  
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DATED: January 2, 2008

/s/ Mark B. Hanson

MARK B. HANSON